



Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste

Comment Sheet

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FEB 07 2000

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Other: friends, reading,
environmental groups

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Comments: (If possible, please reference section number and/or page number in document if applicable.)

1....

I am opposed to burying nuclear wastes.
They should be kept above ground in containers
where they can be better monitored. Our waterways
are already contaminated with nuclear and other
wastes so is some of our land. Having a geologic
Repository for nuclear wastes at Yucca Mountain
or elsewhere could lead to explosions of the buried
wastes. It would, even without an explosion, render
the mountain itself radioactive. In the event of an
earthquake, warm water could flood the repository
and then spread nuclear contamination far and wide.
There is evidence of warm springs under Yucca Mountain,
and of minerals being carried to the top. Scientists have
declared the area unsuitable for storing nuclear wastes.

2

1....

Yucca Mountain is sacred to the Shoshone Indians.
Neither they nor we want it to become a nuclear dumping
ground. 1...next page

Please note: For your comment(s) to be considered in the Final Environmental Impact Statement, your comment(s) need to be received by the Department of Energy by February 9, 2000. To the extent practicable the Department will consider comments received after February 9.

Please feel free to attach additional pages; more postage may be needed. If you prefer to mail your comments, you may use the back side of this sheet as a postage-paid, self-mailer. To do so, fold in thirds along the dotted line so address and postage-paid notice are visible; then secure with tape.



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Name: Nancy Reimer

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I request that these comments be made a part of the official record.

The DEIS violates the intent of the National Environmental Policy Act (NEPA).

3.... • There is no alternative action presented in the DEIS normally required in an EIS. The Nuclear Waste Policy Act as amended in 1987 states that "... the Secretary [of Energy] shall not be required ... to consider the need for a repository, the alternatives to geological disposal, or alternative sites to the Yucca Mountain site;". The Department of Energy (DOE) could have and was asked (1995 scoping hearings) to consider alternative actions, and yet the DOE didn't.

4 • The "no-action" discussion of the DEIS is unreasonable, making on-site storage appear to be untenable. It *appears* as though the no-action discussion is designed to establish a "straw man" to give the preferred alternative (dump at Yucca Mt.) validity. The DEIS gives us no choice. There is no decision to be made, because the DEIS has make it for us. This is completely contrary to the intent of an EIS.

3 cont. It is the obligation of the DOE to consider alternatives to dumping nuclear wastes at Yucca Mountain, or at all, because of the dangers raised, which an EIS must consider, and because Yucca Mountain belongs to the Shoshonne people, who deny permission for such a depository. The casks would corrode and even before that, would emit great heat and radiation, rendering the place toxic. It would remain so until the year 207,000.

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1 cont. The people of Nevada and of other states do not want a nuclear depository or nuclear wastes on their highways, waterways and trains. Stop producing and dumping these materials.

Nuke waste now in water, experts claim

By Matthew L. Wald
NEW YORK TIMES

RICHLAND, Wash. — Nuclear waste has leaked out of the giant underground tanks at the Hanford nuclear reservation here and flowed into the soil, and some experts are convinced it has reached underground water supplies and is flowing toward the Columbia River.

For years, the Energy Department argued that any radioactive material that leaked would be chemically bound to the soil and would not flow, but recent measurements show that cesium and other materials have moved farther than expected.

A group of outside experts brought in by the Energy Department said in January that the model the department had used to calculate the spread of underground materials was "inadequate and unrealistic."

The experts' report said that migration of radioactive cesium through the dirt "does not necessarily indicate an immediate health risk to the surrounding population," but it added that the implications for a cleanup were immense.

The department has been trying to reduce the possibility of future leaks by pumping liquids out of the 28 oldest tanks, emptying about five each year for the last few years.

But in the fiscal year that began Oct. 1, the plan is to begin pumping only two, because of budget constraints. The delay horrifies some environmental experts.

The tanks, some with a capacity of up to 1 million gallons, were built in haste and buried at the Hanford reservation during the Manhattan Project, the World War II effort to build the atomic bomb, and the Cold War.

The tanks hold half a century's worth of highly radioactive and poisonous byproducts of nuclear



EIS001204

Yucca Mountain Unsafe for Storage of Nuclear Waste

219

In 1987 legislators established the Office of the Nuclear Negotiator under the DOE. Its job was to find some place—preferably Indian land—to store the high-level, radioactive waste from 100 nuclear power plants scattered around the country in thirty states.

8 [A new report, compiling the findings of independent geologists from the U.S. and abroad working under a Nevada Nuclear Projects Agency contract, concludes that minerals found on the surface of Yucca Mountain—the proposed high-level nuclear waste dump—were carried there by warm springs from under the mountain.

This report has grave implications for the government's plans to construct the

waste dump at Yucca Mountain. If water rose through the mountain to the surface before, it could do so again; and if radioactive waste were entombed in the mountain, the water could flood the repository and spread the waste throughout the environment.

The new study confirms the position of former Yucca Mountain Project geologist Jerry Szymanski, who resigned from the Department of Energy in 1992 after the agency rejected his findings. While the current water table is substantially below the level of the proposed waste dump, Szymanski believes that earthquakes could cause warm water to squirt to the surface from deep within the earth's crust.

—Source: Citizen Alert, April 1994

Scientists Fear Atomic Explosion of Buried Waste Argument Strikes New Blow Against a Proposal for a Repository in Nevada

221

by William J. Broad

9... [Debate has broken out among Federal scientists over whether the planned underground dump for the nation's high-level atomic wastes in Nevada might erupt in a nuclear explosion, scattering radioactivity to the winds or into ground water or both.

The debate, set off by scientists at the Los Alamos National Laboratory in New Mexico, is the latest blow to the planned repository deep below Yucca Mountain in the desert about 100 miles northwest of Las Vegas. Opponents of nuclear power and Nevada officials have long assailed the project as ill-conceived and ill-managed, and it has encountered numerous delays.

Even if scientists can debunk the new argument that buried waste at Yucca

Mountain might eventually explode, the existence of so serious a dispute so late in the planning process might cripple the plan or even kill it. Planning for the repository began eight years ago and studies of its feasibility have so far cost more than \$1.7 billion. The Federal Government wants to open the repository in 2010 as a permanent solution to the problem of disposing of wastes from nuclear power plants and from the production of nuclear warheads.

[The possibility that buried wastes might detonate in a nuclear explosion was raised privately last year by Dr. Charles D. Bowman and Dr. Francisco Venneri, both physicists at Los Alamos, the birthplace of the atomic bomb. In response, lab manag-

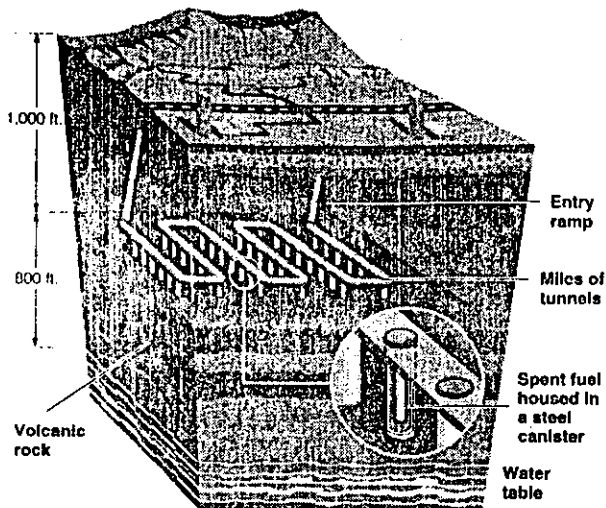
9 cont.

4

BLUEPRINT

A Labyrinth of Radioactivity

A schematic diagram based on the plan for the Yucca Mountain complex. Spent nuclear fuel would be buried a thousand feet below the ground in thousands of canisters, enough to hold 70,000 tons.



Source: Dept. of Energy

ers formed three teams with a total of 30 scientists to investigate the idea and, if possible, disprove it.

While uncovering many problems with the thesis, the teams were unable to lay it to rest, laboratory officials say. So the lab is now making the dispute public

in scientific papers and is considering having it aired at large scientific meetings as well. . . .

Highly radioactive wastes are the main orphan of the nuclear era, having found no permanent home over the decades. In theory, if the Yucca plan wins

approval after a careful study of the area's geology, a labyrinth of bunkers carved beneath the mountain would hold thousands of steel canisters for 10,000 years, until radioactive decay rendered the wastes less hazardous.

The spent fuel from nuclear reactors is permeated with plutonium, which is a main ingredient used in making nuclear bombs.

Since plutonium 239 has a half-life of 24,360 years, significant amounts of it would remain active for more than 50,000 years, long after the steel canisters that once held the radioactive material had dissolved. (A radioactive substance's half-life is the period required for the disintegration of half of its atoms.)

With the end of the cold war, the Nevada site has increasingly been studied for a possible added role as a repository for the plutonium from scrapped nuclear arms. . . .

The most basic solution, Dr. Bowman said, would be removing all fissionable material from nuclear waste in a process known as reprocessing or by transmuting it in his proposed accelerator. Other

possible steps would include making steel canisters smaller and spreading them out over larger areas in underground galleries—expensive steps in a project already expected to cost \$15 billion or more.

A different precaution, Dr. Bowman said, would be to abandon the Yucca site, where the volcanic ground is relatively soluble. Instead, the deep repository might be dug in granite, where migration of materials would be slower and more difficult. . . .

Dr. Daniel A. Dreyfus, the head of civilian radioactive waste management at the Energy Department in Washington, which runs Los Alamos and the Yucca Mountain studies, said he was keeping an open mind on whether Dr. Bowman's thesis might trigger an overhaul of the project. . . .

"Whether Yucca Mountain is the right site, I don't know. Maybe there's no good solution," he added. "But walking away from the problem is no solution either. We better keep trying, because we already made the decision to have the wastes in the first place."

Source: *New York Times*, 3-5-95.

EIS001204



- ☛ Nevada is not the dumping ground for the Nuclear Industry. Yucca Mountain is unsuitable for Radioactive Waste storage. 10
- ☛ Keep Nuclear Waste On-Site, in safe monitored retrievable dry cask storage. 11
- ☛ Keep Radioactive Waste shipments off our Railroads. 12

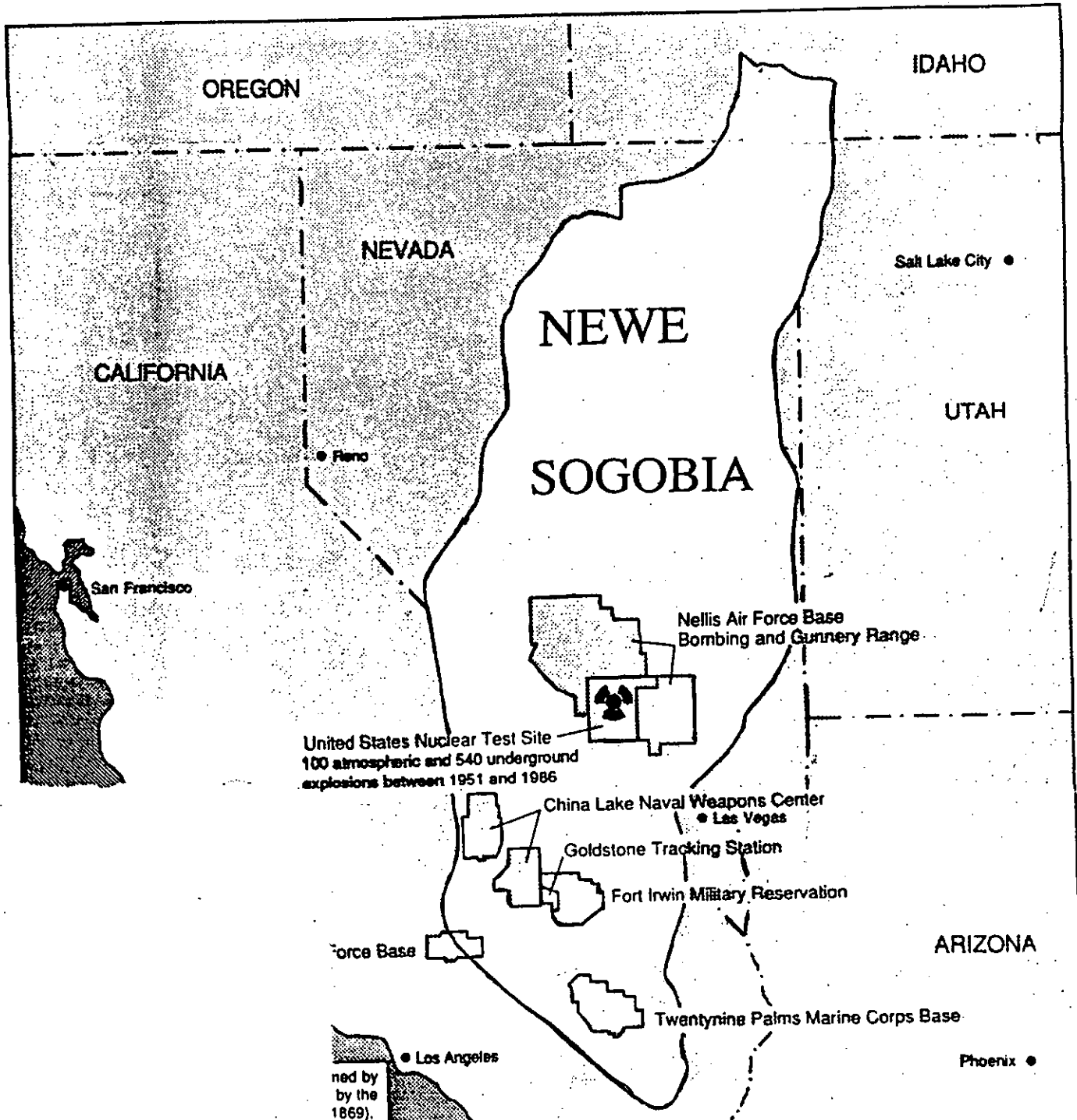
Highways and

Railroads.

13

- ☛ Promote safe, renewable energy resources and legislate conservation methods, that can make nuclear power plants obsolete, stopping Nuclear Waste production. 6

The U.S. Military Invasion of the Western Shoshone Nation*

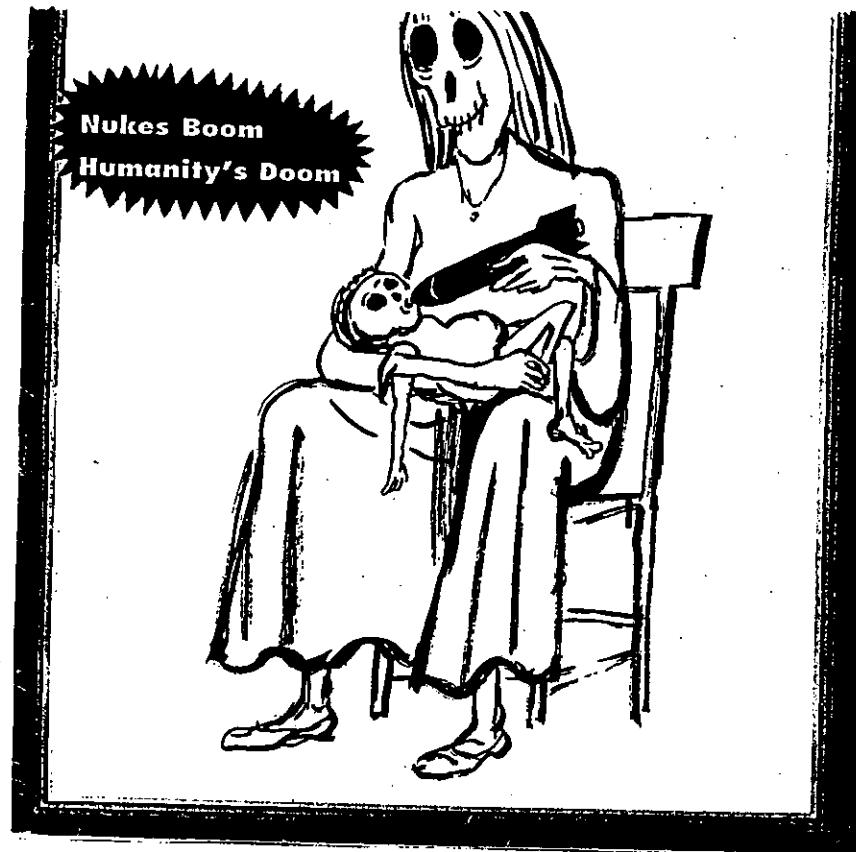


Archbishop Dom Helder Camara (1909-1999)

*"This is the place of the greatest act of violence in the world,
should be the place of the greatest acts of nonviolence".*

—Dom Helder Camara speaking at the Nevada Test Site





Over the next 10 years:

U. S. PLANS TO SPEND \$40 BILLION ON NUCLEAR WEAPONS TESTING, DESIGN & RESEARCH

The Cold War is over, right?

Nuclear stockpiles in the U.S. and Russia will soon decline to 3,500 weapons each, and further declines are expected. A comprehensive test ban is imminent. The labs have stopped designing nuclear weapons and are converting to civilian and environmental research. The nuclear weapons budget is dropping, and the labs' weapons workforces is shrinking.

Dream On.

Yes, the Cold War is over. But none of the rest is true. And the nuclear mob that profited from the Cold War protection racket is now actually growing, untouched by the budget battles that threaten just about everything else in government.

We can be grateful that older weapons are being dismantled. But disarmament it ain't. Even if START II is ratified in Russia -- which is doubtful right now, due in large part of planned U.S. violations of the 1973 ABM Treaty -- the U.S. expects to keep roughly 8,500 nuclear bombs and warheads, about half ready to use and half in "reserve." Without START II, this number will be higher.

What's worse, some senators (with bomb plants in their states) have recently begun to call for more nuclear weapons. Candidate Dole is one of them. He believes it's time to modernize the arsenal with new kinds of warheads. He is far from alone.

A test ban? It is far from accomplished. Negotiations are now at a critical stage, and a treaty is by no means assured. For 40 years, Los Alamos and the other labs have (nearly) a test ban. Behind the

according to the Department of Energy. That agency is about to embark on a multi-billion dollar long-term nuclear spending spree, centered around new "surrogate" testing devices at the labs. These machines are not necessary to maintain existing weapons. They are designed to provide the capability to design and certify new nuclear weapons, test ban or no. Politically, they are part of port-barrel payoffs to the labs and their powerful protectors in return for support of a test ban.

One of these machines is the redundant and ill-advised DARHT facility at Los Alamos. Oinking at \$124 million, it will soon be pushed from the trough just a few years after it is finally finished by a successor machine costing 340 percent more. DARHT will explode mock warheads -- some made

of real plutonium, using what everyone hopes will be leakproof steel tanks.

What's going on here? It's what is euphemistically called "science-based stockpile stewardship." DOE's Assistant Secretary Victor Reis explains: "The stewards really are more important than the equipment . . . the purpose of the Stockpile Stewardship program is in fact to maintain the stewards, and the right type of experiments." Ah, yes, of course. In the final analysis, stockpile stewardship is not about scientists maintaining warheads; it's about warheads maintaining scientists.

Greg Mello is director of the Los Alamos Study Group in Los Alamos, New Mexico



EXAMINER/MARK COSTANTINI
Tanker believed to be carrying nuclear waste prepares to cross under Richmond-San Rafael Bridge on Tuesday.

Nuclear cargo enters Bay amid fear, secrecy

Protest greets radioactive waste

FROM EXAMINER STAFF AND WIRE REPORTS

A closely guarded tanker believed to be carrying a load of used nuclear fuel slipped smoothly into California, its passage marked by scattered protesters, curious onlookers and anxious emergency crews.

Officials wouldn't confirm that the ship Bluebird that passed under the Golden Gate and into the Bay at about 2 p.m. Tuesday was carrying the spent fuel from South Korea, but it was escorted by several Coast Guard ships, an indication it was traveling under tight security.

The red tanker with a blue stripe later docked at the Concord Naval Weapons Station, 25 miles inland, where the spent fuel was transferred to trains bound for the National Engineering and Environmental Laboratory in Idaho, according to news reports.

Many of the boats following the tanker on the cold, foggy day were environmentalists in small boats calling themselves a "Peace Navy."

"Our principle concern at this point is safety, so we are not inter-

ested in interfering with the shipment," said Jacqueline Cabasso, executive director of the Western States Legal Foundation.

Among other security measures, the California Highway Patrol cut off pedestrian and bike access to the Golden Gate for a short time Tuesday morning while the tanker went under the bridge. The road was not closed to cars.

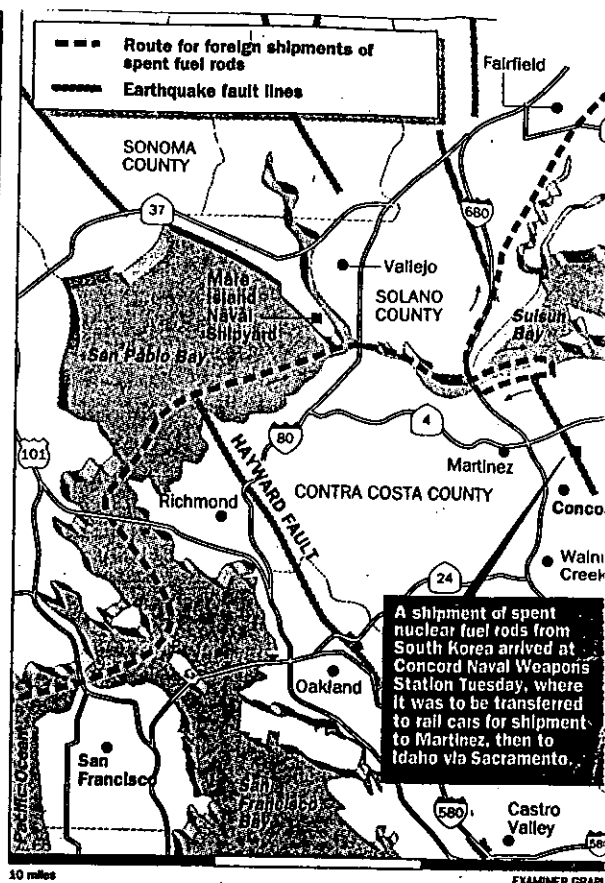
People walking about the bay-side Marina District were bothered by the arrival of the waste.

"They should keep them over there in the country that they got them in," said Mike Cash, 52, of Deming, N.M. "Don't ship them over here to the U.S.A. We don't need them over here."

Some who were concerned seemed resigned to the shipment.

"It has to come through somewhere," said Tom Goossens, 49, of San Francisco. "I'm sure (the government) examined the various possibilities and came up with this as the least expensive. But someone is going to be affected, and no one is happy with nuclear waste coming in."

On the other side of the Bay, some 30 protesters and onlookers gathered at an Amtrak station in Martinez, where the trains will pass through after they leave Con-



cord.

The eclectic group, which included aging hippies and clean-cut high school kids, held cardboard anti-nuclear signs and circled around speakers who denounced the transportation of foreign nuclear waste as dangerous and hypocritical.

At one point, a plane flew overhead towing a banner reading, "Danger, Nuclear Train Coming."

Tuesday's shipment is the first of five scheduled to follow the same route over the next 11 years. The shipment carried about 360 fuel rods, according to Department of Energy officials.

"The public demonstrations have been very moderate, and ... we're very thankful of that," said John Belluardo of the Energy Department, which is bringing the fuel through California.

Those who plan to protest in Davis, Sacramento and other sites along the route say they intend to keep it that way.

"We certainly don't expect to be able to stop this shipment," said

Marylia Kelly of Tri-Vall-CARES in Livermore, one of several groups opposing the return foreign nuclear fuel rods.

Kelly said protesters were mobilizing so that "if the public all along the transportation routes become more knowledgeable and more vocal, there is a chance of stopping future shipments."

10

FRIDAY, June 4, 1999

THE OAKLAND TRIBUNE

NEWS-13

Nuclear shipment sparks concern in Alameda County

By Dennis J. Oliver
STAFF WRITER

A planned shipment of 10 spent nuclear fuel rods from Pennsylvania to a secluded research facility near Pleasanton should not move forward before the public is briefed on the potential danger involved, Alameda County Board of Supervisors President Wilma Chan said Thursday.

In a strongly worded letter to the federal Nuclear Regulatory Commission, Chan has asked the agency and the General Electric Vallecitos Nuclear Center to host a joint public hearing about the shipments, which would be

made by truck.

"I would like the agenda to include current and planned safety precautions, potential risks involved and the volume of radioactive material stored currently and planned for the future at this site," Chan said. "As importantly, I would like to examine alternatives to generating and shipping radioactive materials to Alameda County."

The radioactive rods, measuring 12 feet long and 1 inch in diameter, are to be packed into shipping casks at a Limerick, Pa., plant and trucked to the Vallecitos facility, three miles south of Pleasanton along Highway 84, some-

time within the next few months, said GE spokesman John Redding.

The shipment had been scheduled for last year but was delayed because of engineering problems with the casks they were to be carried in and a scheduling conflict with the staff at Vallecitos.

Redding said GE would be willing to hold a public hearing, and he expressed confidence the company and those in charge of shipping the rods would be able to calm any community fears.

"You get concerned about what you don't know and a little bit of informa-

tion goes a long way toward making people comfortable with this," Redding said.

"We're working with Alameda County, the City of Pleasanton and the Nuclear Regulatory Commission."

Redding said, the casks used to transport the rods are nearly impenetrable and the risk of exposure minimal. He also stressed that there would be just one shipment, not a series of ongoing shipments.

The casks that will be used are licensed and regulated by the NRC and U.S. Department of Transportation, Redding said. "The casks are set on

fire for 30 or 60 minutes while being tested and they come out unscathed. It's fairly amazing."

Vallecitos Nuclear Center was a pioneer of nuclear engineering for electricity production in the 1950s and 1960s and still makes radioactive materials for medical research and life-saving surgeries.

Vallecitos is under contract with Palo Alto-based Energy Production Research Institute to find out if lighter fuel rods can be used for longer than seven years without losing production efficiency.

12-NEWS

If nuclear wastes are sent to a geologic repository, they will be sent there on our highways, roads, waterways and rail ways, which is not safe despite official assurances. The Argus, The Review, The Tribune, The Herald, The Times-Star

THURSDAY, December 9, 1999

Civilian plant cleared to produce nuclear bomb material

ASSOCIATED PRESS
KNOXVILLE, Tenn. — The Tennessee Valley Authority approved a plan Wednesday to produce nuclear weapons material for the first time in U.S. history, breaching a long-standing wall between civilian and military nuclear power.

The TVA board voted 3-0 to allow the Wabash Bar Nuclear plant near Spring City, 55 miles southwest of Knoxville, to be used to produce tritium as early as 2003, while continuing to

make electricity for TVA. The agreement between TVA and the Energy Department angered peace activists, who said it was a civilian reactor to make tritium runs counter to U.S. efforts to get other countries to reduce nuclear weapons.

They're watching what we do, not listening to what we say, said Ralph Hutchinson of the Oak Ridge Environmental Peace Alliance, who said the report also concluded that it was even more management has urged other countries to avoid such dual military-civilian use of their nuclear reactors. Russia and Canada do so, said Energy Department spokesman Matthew Donoghue.

Donoghue pointed to a 1998 interagency report to Congress that concluded no international laws or agreements would prohibit the production of tritium, a hydrogen isotope that

public power producer, was picked by the Energy Department a year ago to be the government's new source for tritium and had worked on the contract since 1996.

Under the agreement, which DOE is expected to sign in the next few weeks, TVA would be paid \$25 million over the next three years to prepare for tritium production and obtain Nuclear Regulatory Commission licensing.

The deal extends through the life of Wabash Bar, which went on line in 1986 and has an operating license until 2035. TVA is estimated that it would produce 14 to 3 kilograms of tritium a year, depending on needs. The Energy Department would pay TVA \$10 million a year for the tritium.

But in asking you in the name of God to say no to this madness, said Erik Johnson, a Presbyterian minister from